

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In Re:

MELISSA CORINNE CARTER

Debtor.

Case No: 20-31398-KLP

FREEDOM MORTGAGE CORPORATION,

Movant,

Chapter 13

v.

MELISSA CORINNE CARTER,  
CARL M. BATES, Trustee,

Respondents.

NOTICE OF DEFAULT

PLEASE TAKE NOTICE that Freedom Mortgage Corporation, by and through undersigned counsel, hereby files this Notice of Default (the "Notice") pursuant to the provisions of the Consent Order Modifying Automatic Stay (the "Order") entered in the above referenced bankruptcy case on December 30 ,2020, and respectfully submits the following:

1. That the Debtor is in default in making payments required under the Order, as set forth immediately hereinbelow;
2. That the regular post-petition mortgage payments which were due Freedom Mortgage Corporation for the months of April 2021 through July 2021, in the amount of \$819.60 each, have not been paid.

Robyn D. Pepin, VSB #77784  
John J. Chappell, III, VSB #88617  
Vanessa S. Carter, VSB #86104  
Glasser and Glasser, P.L.C.  
Crown Center, Suite 600  
580 East Main Street  
Norfolk, Virginia 23510  
757-625-6787  
Attorneys for Freedom Mortgage Corporation

3. That the arrearage cure payment installments which were due Freedom Mortgage Corporation on April 20, 2021 through June 20, 2021, in the amount of \$715.02 each, have not been paid.
4. To cure this default, the sum of \$5,380.55 (which sum includes attorney's fees in the amount of \$50.00 and gives credit for a suspense balance of \$92.91) (collectively, the "Default") must be forwarded to Freedom Mortgage Corporation at 10500 Kincaid Drive, Fishers, IN 46037-9764.
5. Pursuant to the terms of the Order, the Debtor or Trustee must take one of the following actions within fourteen (14) days of the mailing date of this Notice.
  - a. Cure the Default; or
  - b. File an Objection with the Court stating that no default exists; or
  - c. File an Objection with the Court stating any other reason why an Order granting relief from the automatic stay should not be entered.
6. If the Debtor or Trustee does not take one of the actions as set forth in paragraph 5 hereinabove, Freedom Mortgage Corporation may file a Certificate that it has complied with the terms of the Order and submit a proposed Order granting it relief from the automatic stay without further notice or hearing, which the Court may enter.
7. If the automatic stay is terminated, the collateral may be sold at foreclosure.

FREEDOM MORTGAGE CORPORATION

By /s/ Robyn D. Pepin  
Of Counsel

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2021, a true copy of the foregoing Notice of Default was submitted for electronic transmission to James E. Kane, Attorney for Debtor, and to Carl M. Bates, Trustee, and was mailed, first class, postage prepaid to Carl M. Bates, Trustee, at P.O. Box 1819, Richmond, VA 23218 and to Melissa Corinne Carter, Debtor, at 402 Mansfield Drive, Henrico, VA 23223.

/s/ Robyn D. Pepin  
Robyn D. Pepin, VSB #77784  
John J. Chappell, III, VSB #88617